

JOINT PROPOSED PRETRIAL ORDER

Pulliam v. County of Fort Bend, Texas, et al.

Case No. 4:22-cv-4210

ATTACHMENT F

Defendants' Witness List

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JUSTIN PULLIAM

§
§
§
§
§
§
§
§

V.

CIVIL ACTION NO.: 4:22-CV-4210

FORT BEND COUNTY, TEXAS, ET.
AL.,

DEFENDANTS' WITNESS LIST

The following parties may be called by Defendant to testify at trial, either in person or by deposition:

1. **Justin Pulliam (will be called to testify)**

c/o Christen M. Hebert
Jeffrey T. Rowes
Michael Peña
Institute for Justice
816 Congress Avenue, Suite 960
Austin, Texas 78701
(512) 480-5936

Substance: Mr. Pulliam will be called to testify regarding the events of (i) July 12, 2021 and (ii) December 21, 2021. Mr. Pulliam will also be called to testify in connection with damages claimed in this proceeding.

2. **Kelsey Pulliam (may be called to testify)**

[REDACTED]

Substance: Ms. Pulliam may be called to testify regarding the events of December 21, 2021.

3. **Sheriff Eric Fagan (will be called to testify)**

c/o Kevin T. Hedges
Rolf F. Krueger
Fort Bend County Attorney's Office
401 Jackson Street, 3rd Floor
Richmond, Texas 77469
(281) 341-4555

Substance: Sheriff Fagan will be called to testify regarding the events of July 12, 2021 and policies and procedures of the Fort Bend County Sheriff's Office.

4. **Sgt. Robert Hartfield (may be called to testify)**

c/o Kevin T. Hedges
Rolf F. Krueger
Fort Bend County Attorney's Office
401 Jackson Street, 3rd Floor
Richmond, Texas 77469
(281) 341-4555

Substance: Sgt. Hartfield may be called to testify regarding the events of July 12, 2021.

5. **Dep. Jonathan Garcia (may be called to testify)**

c/o Kevin T. Hedges
Rolf F. Krueger
Fort Bend County Attorney's Office
401 Jackson Street, 3rd Floor
Richmond, Texas 77469
(281) 341-4555

Substance: Dep. Garcia may be called to testify regarding the events of July 12, 2021.

6. **Lt. Taylor Rollins (will be called to testify)**

c/o Kevin T. Hedges
Rolf F. Krueger
Fort Bend County Attorney's Office
401 Jackson Street, 3rd Floor
Richmond, Texas 77469
(281) 341-4555

Substance: Lt. Rollins may be called to testify regarding the events of December 21, 2021.

7. **Dep. Ricky Rodriguez (will be called to testify)**

c/o Kevin T. Hedges
Rolf F. Krueger
Fort Bend County Attorney's Office
401 Jackson Street, 3rd Floor
Richmond, Texas 77469
(281) 341-4555

Substance: Dep. Rodriguez may be called to testify regarding the events of December 21, 2021.

8. **Chief Mattie Provost (may be called to testify)**

c/o Kevin T. Hedges
Rolf F. Krueger
Fort Bend County Attorney's Office
401 Jackson Street, 3rd Floor
Richmond, Texas 77469
(281) 341-4555

Substance: Chief Provost may be called to testify regarding the policies and procedures of the Fort Bend County Sheriff's Office.

9. **April Lefler (may be called to testify)**

[REDACTED]

Substance: Ms. Lefler may be called to testify regarding the events of December 21, 2021.

10. **Lori Rosas (may be called to testify)**

[REDACTED]

Substance: Ms. Rosas may be called to testify regarding the events of December 21, 2021.

11. **Brittany Ford (may be called to testify)**

[REDACTED]

Substance: Ms. Ford may be called to testify regarding the events of July 12, 2021.

12. **Charly Edsitty (may be called to testify)**



Substance: Ms. Edsitty may be called to testify regarding the events of July 12, 2021.

13. **Debra Elizondo (may be called to testify)**

c/o Kevin T. Hedges
Rolf F. Krueger
Fort Bend County Attorney's Office
401 Jackson Street, 3rd Floor
Richmond, Texas 77469
(281) 341-4555

Substance: Ms. Elizondo may be called to testify in her capacity as the custodian of records for the Fort Bend County Sheriff's Office.

14. **Detective Travis James (will be called to testify)**

c/o Kevin T. Hedges
Rolf F. Krueger
Fort Bend County Attorney's Office
401 Jackson Street, 3rd Floor
Richmond, Texas 77469
(281) 341-4555

Substance: Det. James may be called to testify regarding his investigation into the events of December 21, 2021.

Respectfully submitted,

Bridgette Smith-Lawson
Fort Bend County Attorney

By: /s/ Kevin T. Hedges

Kevin T. Hedges
Attorney-in-Charge
State Bar No. 09370100
Federal ID No. 9939
kevin.hedges@fortbendcountytexas.gov
Rolf F. Krueger
State Bar No. 24080990
Federal ID No. 3041756
rolf.krueger@fortbendcountytexas.gov
Fort Bend County Attorney's Office
401 Jackson Street, 3rd Floor
Richmond, Texas 77469
(281) 341-4555
(281) 341-4557 (Fax)

ATTORNEYS FOR DEFENDANTS
FORT BEND COUNTY, TEXAS, SHERIFF
ERIC FAGAN, AND OFFICER TAYLOR
ROLLINS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served on the parties and counsel identified on the attached service list by electronic service on this the 1st day of July, 2025.

/s/ Kevin T. Hedges

Kevin T. Hedges

SERVICE LIST

Christen M. Hebert
Jeffrey T. Rows
Michael Pena
Institute for Justice
816 Congress Avenue, Suite 970
Austin, Texas 78701
chebert@ij.org
jrows@ij.org
mpena@ij.org